

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CITY OF ISSAQUAH, a municipal  
corporation,

Plaintiff,

vs.

ORA TALUS 90, LLC, a Delaware limited  
liability company; and RESMARK EQUITY  
PARTNERS, LLC, a Delaware limited liability  
company,

Defendants.

ORA TALUS 90, LLC, a Delaware limited  
liability company; and RESMARK EQUITY  
PARTNERS, LLC, a Delaware limited liability  
company,

Third-Party Plaintiffs,

vs.

TERRA TALUS LLC, a Washington limited  
liability company; ELEMENT RESIDENTIAL

No. 18-cv-00910-RSM

JOINT MOTION AND ORDER TO  
CONTINUE DEPOSITION OF KEITH  
CLINE PAST DISCOVERY DEADLINE

**SAME DAY STIPULATED MOTION:  
June 15, 2021**

INC., a Washington corporation; JOSHUA  
FREED, an individual; J.R. HAYES & SONS,  
INC., a Washington corporation; and TERRA  
ASSOCIATES, INC., a Washington  
corporation, TALUS MANAGEMENT  
SERVICES LLC, a Washington limited  
liability company; and TALUS 7 & 8, LLC, a  
Washington limited liability company,

Third-Party Defendants.

TALUS 7 & 8 INVESTMENT, LLC, a  
Washington limited liability company; J.R.  
HAYES & SONS, INC., a Washington  
corporation,

Third-Party Plaintiffs,

vs.

KULCHIN FOUNDATION DRILLING  
COMPANY, a Washington corporation, and  
BIG MOUNTAIN ENTERPRISE LLC, a  
Washington limited liability company,

Third-Party Defendants.

### **STIPULATED MOTION**

COME NOW the above-captioned parties by and through their undersigned attorneys and stipulate to continue the deposition of City of Issaquah expert witness Keith Cline for one additional hour. During the course of Mr. Cline's May 27, 2021 deposition, eight pages of notes regarding his company's examination of evidence in this case were produced to the parties. Since other parties did not have time to review these notes and confer with their experts regarding the notes before Mr. Cline's deposition, the City of Issaquah agreed to allow for such review and for Mr. Cline's deposition to be continued to a later date to permit questioning on the content of the examination notes only. The deadline for expert depositions expired on May



28, 2021. Accordingly, the parties request the deadline be extended to allow for one additional hour of deposition time with Mr. Cline on a date and time mutually convenient to all parties.

IT IS SO STIPULATED.

Dated this 10<sup>th</sup> day of June, 2021.

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Dated this 7<sup>th</sup> day of June, 2021.

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## ORDER

PURSUANT TO THE STIPULATED MOTION, IT IS SO ORDERED. The deadline for expert witness discovery is extended to allow for one additional hour of deposition time with expert Keith Cline on a date and time mutually convenient to all parties.

DATED this 16<sup>th</sup> day of June, 2021.



RICARDO S. MARTINEZ

CHIEF UNITED STATES DISTRICT JUDGE



Presented by:

Dated this 10<sup>th</sup> day of June, 2021.

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**CERTIFICATE OF SERVICE**

The undersigned certifies that under penalty of perjury under the laws of the State of Washington that on the below date I caused to be served the foregoing document on:

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**SIGNED** this 15<sup>th</sup> day of June, 2021, at Seattle, Washington.

s/Becky Phares

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